

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARMEN HACOPIAN and LUSINE
HAYRAPETYAN, *individually and on behalf
of all others similarly situated,*

Plaintiffs,

v.

BLACKROCK, INC. and JOHN DOE
ENTITY 1,

Defendants.

No. 1:25-cv-2361 (JSR)

Hon. Jed S. Rakoff

NOTICE OF DEFENDANT BLACKROCK, INC.'S MOTION TO DISMISS

PLEASE TAKE NOTICE that on May 23, 2025, at 3:30 p.m., or as soon as it may be heard, before the Honorable Jed S. Rakoff, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, NY, 10007, Defendant BlackRock, Inc. will and hereby does move to dismiss with prejudice Plaintiffs' Complaint for lack of standing under Rule 12(b)(1) of the Federal Rules of Civil Procedure and for failure to state a claim under Rule 12(b)(6) of the Federal Rules of Civil Procedure.

BlackRock's motion is based on this Notice of Motion; the Memorandum of Law in Support of BlackRock's Motion to Dismiss; the accompanying Declaration of Alan Schoenfeld in Support of BlackRock's Motion to Dismiss and the exhibit thereto; the pleadings and other papers on file in this action; any argument; and any other evidence the Court may consider.

Dated: April 18, 2025

Respectfully submitted,

By: /s/ Alan E. Schoenfeld

Alan E. Schoenfeld

Lydia Turnage (*pro hac vice*)

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